

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE WORLD TRADE CENTER
LOWER MANHATTAN DISASTER
SITE LITIGATION

21MC102(AKH)

RAMIRO BASTIDAS (AND WIFE, SOILA BASTIDAS),

07CV8278(AKH)

Plaintiff(s),

-against-

80 LAFAYETTE ASSOCIATES LLC, et al.,

Defendants.

**NOTICE OF ADOPTION BY
BLUE MILLENNIUM
REALTY LLC OF ANSWER
TO MASTER COMPLAINT**

PLEASE TAKE NOTICE that defendant **BLUE MILLENNIUM REALTY LLC** (hereinafter “Blue Millennium”) as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint adding new defendants not previously served filed in the above-referenced action, herein adopts Blue Millennium’s Answer to Master Complaint dated August 1, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). **BLUE MILLENNIUM** has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (¶ J(2)).

PLEASE TAKE FURTHER NOTICE THAT defendant, Blue Millennium reserves its right to assert any defenses to which it is entitled, including but not limited to those enumerated in Case Management Order No. 4 (¶¶ D(1)-(5)).

WHEREFORE, Blue Millennium demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York
December 5, 2007

HARRIS BEACH PLLC
Attorneys for Defendant
BLUE MILLENNIUM REALTY LLC

/s/
Stanley Goos, Esq. (SG 7062)
100 Wall Street, 23rd Floor
New York, New York 10005
(212) 687-0100

TO:

Paul Napoli, Esq.
Worby Groner Edelman & Napoli Bern LLP
115 Broadway, 12th Floor
New York, New York 10006

Robert A. Grochow, Esq.
Robert A. Grochow, P.C.
233 Broadway, 5th Floor
New York, New York 10279

Gregory J. Cannata, Esq.
Law Offices of Gregory J. Cannata
233 Broadway, 5th Floor
New York, New York 10279
Liaison Counsel for Plaintiff

James E. Tyrrell, Esq.
Joseph Hopkins, Esq.
Patton Boggs LLP
One Riverfront Plaza, 6th Floor
Newark, New Jersey 07102

Thomas Egan, Esq.
Flemming Zulack Williamson Zauderer LLP
One Liberty Plaza
New York, New York 10006
Liaison Counsel for the Defendants

All Counsel via ECF

CERTIFICATION AS TO SERVICE

The undersigned certifies that on December 5, 2007, I caused to be filed and served the following document electronically via the Court's ECF system upon the parties:

1. Notice of Blue Millennium's Adoption of Answer to Master Complaint.

Dated: December 5, 2007

/s/
Stanley Goos, Esq. (SG 7062)